



Christine Jines
Director -
Federal Regulatory

SBC Telecommunications, Inc.
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Washington D.C. 20005
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EX PARTE OR LATE FILED

April 7, 1999

RECEIVED

APR 07 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EXPARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Implementation of the Subscriber Carrier Selection
Changes Provisions of the Telecommunications Act of 1996; Policies and Rules
concerning Unauthorized Change of Consumers Long Distance Carrier - CC
Docket No. 94-129/FCC 98-334

Dear Ms. Salas:

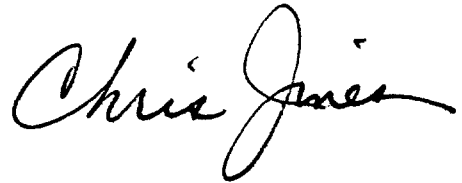
On Tuesday, April 6, 1999, Barbara Hunt, Julie Siliven and Linda Yohe, Southwestern Bell Telephone Company (SWBT) and the undersigned met with Dorothy Attwood, Glenn Reynolds, Anita Cheng and Kimberly Parker of the Enforcement Division of the Common Carrier Bureau to discuss the attached document. SWBT discussed the details of its implementation of the Commission's December 23, 1998 order in the above proceeding. Also discussed was SWBT's Petition for Reconsideration and Clarification of the Commission's order.

In accordance with 47 C.F.R. 1.1206(a)(1) of the Commission's rules, the original of this letter and one copy are being filed with your office for inclusion in the public record. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

No. of Copies rec'd 073
List A B C D E

Please direct any inquiries concerning the foregoing to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Chris Jones". The signature is written in a cursive style with a large, looping "C" and a long, sweeping underline.

Attachment

CC: Dorothy Attwood
Glenn Reynolds
Anita Cheng
Kimberly Parker

IMPLEMENTATION OF THE SLAMMING ORDER BY SBC

- SBC can implement the Order as written, with some clarification.
- Flow charts
- SBC has already incurred some cost to implement the Slamming Order.
- The volume of slamming has declined in SBC states:
 - (1) Customer Notification System ("CNS").
 - (2) California third party verification requirement.
 - (3) Age limit on LOAs.
 - (4) Customer Choice Protection ("CCP" or preferred carrier freeze).
- Further reduction will be realized with:
 - (1) verification requirements, effective April 27, 1999, and
 - (2) liability rules, effective May 17, 1999.

RECONSIDERATION POINT

- Alleged unauthorized carrier, not authorized carrier, should rebill the customer when a determination is made that no slam occurred.

CLARIFICATION POINTS NEEDED TO IMPLEMENT ORDER

- Authorized carrier's pursuit of paid claim is optional
- Notification requirements
- Obligation to accept aged and/or defective LOAs
- Who pays pic change charge

OTHER CLARIFICATION POINTS

- PIC Switchback Tariff status
- Status of Billing and Collection practice of issuing immediate credits

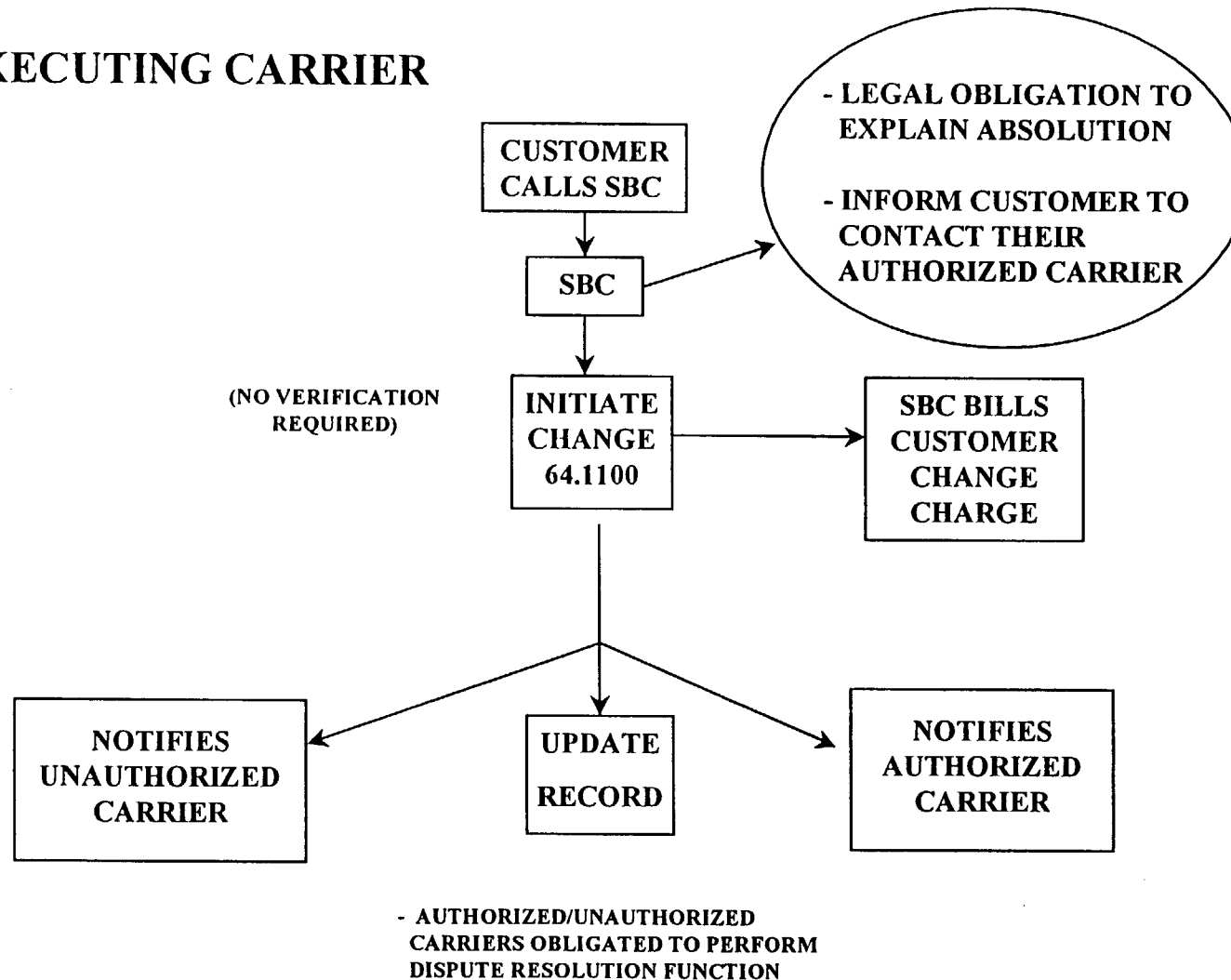
- Responsible Organization verification on 800 service
- Marketing use of disconnect codes.

THIRD PARTY ADMINISTRATOR PROPOSALS

- Industry evaluation through USTA
- Initial reaction – delays effect of liability provisions for 12-18 months
- Costly process

DRAFT

SBC - EXECUTING CARRIER



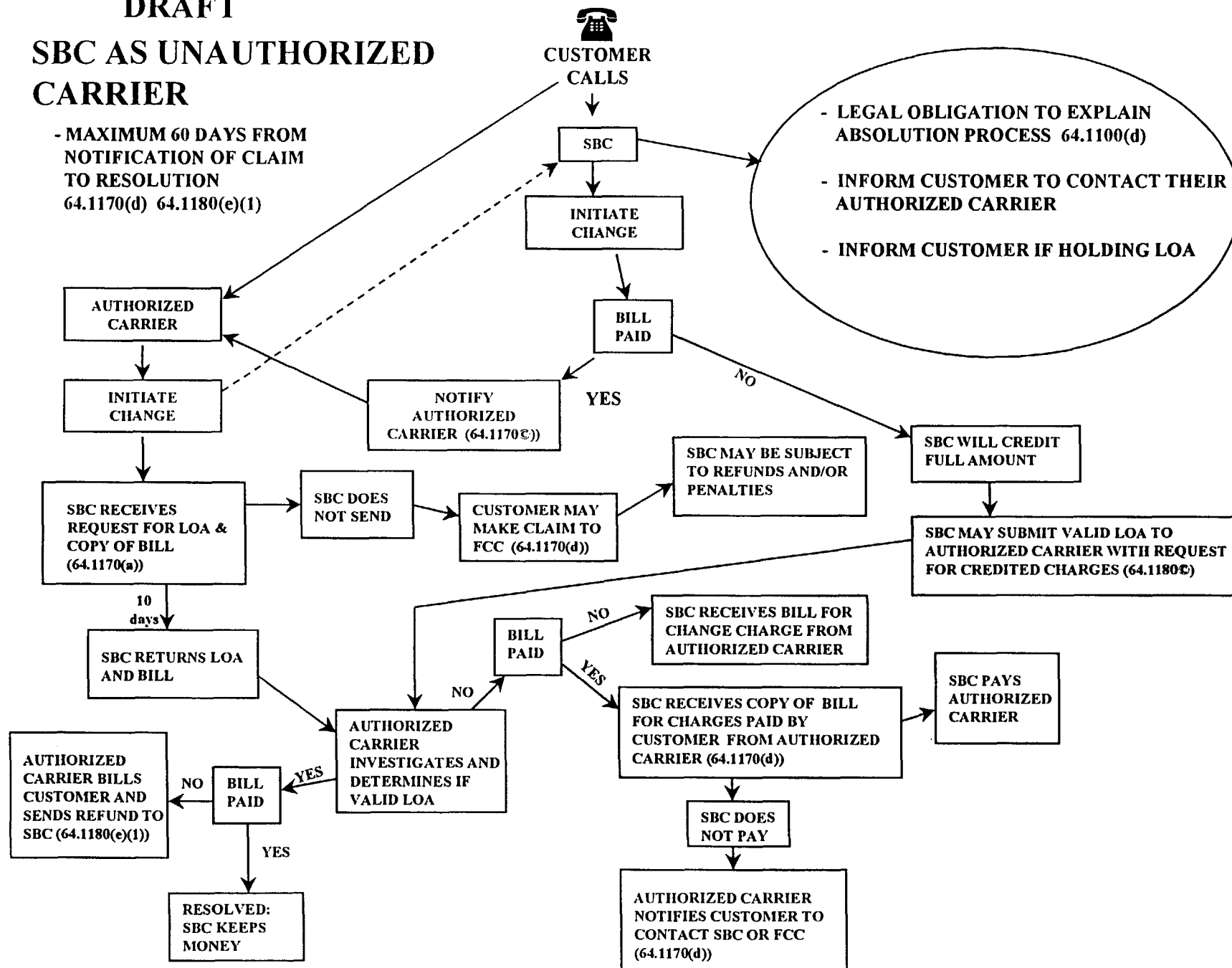
- **SBC SLAMMED BY ANOTHER CARRIER**
- **MAXIMUM 60 DAYS FROM NOTIFICATION OF CLAIM TO RESOLUTION**
64.1170(d) & 64.1180(c)(1)
- **"LOA" HEREIN REFERS TO ANY APPROVED FORM OF AUTHORIZATION**



DRAFT

SBC AS UNAUTHORIZED CARRIER

- MAXIMUM 60 DAYS FROM NOTIFICATION OF CLAIM TO RESOLUTION 64.1170(d) 64.1180(e)(1)



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Sprint

1850 M Street NW, 11th Floor
Washington, DC 20036

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OFFICE OF THE SECRETARY

April 7, 1999

Magalie Salas
Secretary
Federal Communications Commission
TW-A325
445 12th St., SW
Washington, D.C. 20554

Re: EX PARTE PRESENTATION
CC Docket No. 98-170

Dear Ms. Salas:

Today, Leon Kestenbaum, Marybeth Banks, Peter Sywenki, and I, all of Sprint Corp., met with Dave Konuch and Warren Firschein of the Enforcement Division, Common Carrier Bureau, to discuss truth in billing. Sprint's comments were consistent with points raised in its pleadings on this issue in the above-captioned proceeding.

An original and one copy of this letter are being filed.

Sincerely,



Norina Moy
Director, Federal Regulatory
Policy and Coordination

cc: D. Konuch
W. Firschein

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